REMARKS

Upon entry of the present amendment, claims 1-7, 11, 13, 15, 16, and 18 will have been amended, while claims 8-10, 12, 14, 17, and 19 will have been canceled. Additionally, claims 20-23 will have been submitted for consideration by the Examiner.

In view of the herein contained amendments and remarks, Applicant respectfully requests reconsideration and withdrawal of each of the outstanding rejections set forth in the above-mentioned Official Action, together with an indication of the allowability of all of the claims pending in the present application.

Applicant notes with appreciation the Examiner's consideration of the documents cited in the Information Disclosure Statement filed in the present application by the return of the initialed and signed copy of the PTO-1449 Form accompanying the Information Disclosure Statement filed herein.

Applicant further notes with appreciation the Examiner's acknowledgment of Applicants claim for foreign priority under 35 U.S.C. § 119 and the receipt of the certified copies of the priority documents. Applicant also notes with appreciation the Examiner's acceptance of the drawing corrections filed December 17, 2001.

The Examiner has rejected claims 1-19 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,991,798 to OZAKI et al.

Applicant respectfully traverses the rejection and asserts that is it inappropriate based the amendments and remarks of the present paper.

One aspect of the present invention is to provide or know, a correspondence between content and metadata. In other words, when a package including content, which is primarily distributed through a network, and metadata, which refers to individual files different from the content and which contains information related to the content, is recorded on a single recording medium (e.g., SD card), the correspondence between the content and metadata is made known at the communication terminal that uses and plays back the content recorded on the recording medium. This feature, in the claimed combination, is not disclosed by OZAKI et al.

In contrast to the present invention, OZAKI permits a user to display data taken from different media sources together on a single display without concern as to the differences between the sources, such as a web server, package media, and e-mail.

In the rejection, the Examiner appears to take the position that the OZAKI "package medium" and the "package" of the present invention are equivalent. However, these two packages differ greatly. In particular, the OZAKI package medium refers to, for example, a CD-ROM or a DVD-ROM.

In contracts, the "package" according to the present invention may contain HTML files having e.g. newspaper articles for a predetermined time period written in HTML format together with accompanying image/audio files. For example, the

present invention can be directed to, a newspaper article distribution service whereby all the above files (i.e. for a predetermined time period) are distributed as a single "package."

In further contrast to the present invention, OZAKI uses three tables, a cache management table (See figure 5), a disk information management table (see figure 6), and a disk link management table (see figure 7).

In particular, the cache management table indicates correspondence between a URL, that includes information required to specify where location files are stored, and a file name. The disk information management table indicates correspondence between an information ID and a directory name of the package media. The disk link management table indicates correspondences between a URL and information relating to the package media in which the information specified by the URL is stored.

The present invention uses at least a metadata correspondence management file as generally recited in claims 1, 13, and 23. The metadata correspondence management file indicates correspondence between distributed objects (i.e. content) and metadata files. The metadata files refer to individual files which contain information relating to the objects and which are used to retrieve, categorize, and organize the objects. Moreover, the metadata correspondence management file holds the correspondence between an identifier of a metadata file and an identifier of an object.

The Examiner appears to assert, at page 2, lines 12-21 of the Official Action, that the metadata correspondence management file of the present invention and OZAKI's cache management table are equivalent. However, as noted above, these are completely different. There is no disclosure or suggestion in OZAKI that relates to the content file group management file (i.e. the metadata correspondence management file) of the present invention.

The metadata correspondence management file of the present invention holds correspondence between objects and metadata files, where the metadata files refer to individual files that are different from the objects and that contain information relating to the objects. In contrast, the OZAKI cache management table 50 contains correspondence between a URL 501 and a file name 502 (see column 10, line 24 – column 10, line 20). The URL 501 and the file name 502 refer to information that indicate an identifier of a target file and the name this target file assumes upon accommodation in the terminal apparatus as cache, respectively. In other words, unlike the metadata correspondence management file of the present invention, the OZAKI URL 501 and file name 502 do not indicate correspondence between different files.

Moreover, the OZAKI file name 502 refers to information that indicates the name the data specified by a URL 501 assumes upon caching in the terminal apparatus. In other words, the file name 502 relates to a URL 501. On the other hand, a metadata file according to the present invention refers to a file used to

retrieve, categorize, and organize objects and is thus clearly different from the file name 502.

The present invention is configured so as to inform, when a package is recorded on a recording medium, a correspondence between objects distributed through a network, and metadata files which refer to individual files that contain information relating to the objects and which are used to retrieve, categorize, and organize the objects. As a result, the present invention enables the terminal apparatus that receives the package to easily search for the metadata files e.g. for playback of the objects.

In contrast, as described above, OZAKI does not discloses a table that is equivalent to the metadata correspondence management file of the present invention. Accordingly, in OZAKI, the terminal apparatus is not provided with a correspondence between the files, which makes proper and accurate playback difficult.

As explained above, the present invention features a metadata correspondence management file, and, using this particular file, manages correspondence between objects and metadata files that are distributed in the individual files. OZAKI fails to disclose or suggest this feature of the present invention as recited in each of the claimed combinations. As a result, the present invention enables a terminal that plays back an object to search for and read the metadata corresponding to the object and to play back the object correctly. Thus the pending claims are clearly patentable over OZAKI.

With regard to dependent claims 2-7, 11, 15, 16, and 18, Applicant asserts that they are allowable on their own merit and at least because they depend on independent claim 1, which Applicant submits has been shown to be allowable. Moreover, these dependent claims recite additional features not disclosed in the prior art. For example, claim 2 includes a "record type" that refers to information that indicates where a metadata correspondence management file is stored. OZAKI does not indicate where such a file, or even a cache management table, is stored. Likewise, the information corresponding to 603 in OZAKI also does not indicate where a disk information management table is stored.

Additionally, minor amendments have been made to claims 1-7, 11, 13, 15, 16, and 18 in order to their language. In these amendments, Applicant has made several additional changes to the language of the claims to render the same more self consistent, as well as more fully in compliance with U.S. syntax, idiom and grammar. These amendments do not change the scope of the claims but are merely cosmetic changes that give rise to no file wrapper estoppel.

In view of the fact that none of the art of record, whether considered alone or in any proper combination, discloses or suggests the present invention as defined by the pending claims, and in further view of the above remarks, reconsideration of the Examiner's action and allowance of the present application are respectfully requested and are believed to be appropriate.

New claims 20-23 add no prohibited new matter and are submitted to be allowable. They are base upon original claims 12, 14, 17, and 23.
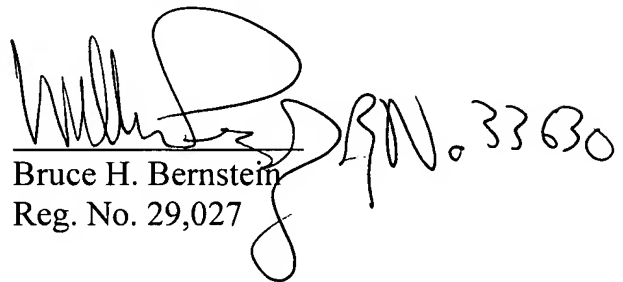
SUMMARY AND CONCLUSION

Applicant has made a sincere effort to place the present application in condition for allowance and believe that he has now done so. Applicant has pointed out the specific language of Applicant's claims that define over the references of record and respectfully request an indication to such effect, in due course.

The amendments to the claims made in this amendment have not been made to overcome the prior art, and thus, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully Submitted,
Naohiko NOGUCHI

Bruce H. Bernstein
Reg. No. 29,027

July 22, 2004
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, VA 20191
(703) 716-1191